

TSD File Inventory Index

Date: May 29, 2001
Initial: CMG/enevco

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Note: Transmittal Letter to Be Included with Reports.

Comments:



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

October 18, 1993

Re: Completion of Partial
Closure
U.S. EPA ID No.
OHD066052804

General Electric Co.
Ohio Lamp Plant
Attn: Thomas Gapinski, Plant Manager
1210 No. Park Ave.
Warren, Ohio 44483

RECEIVED
WMD RECORD CENTER

AUG 24 1994

Dear Mr. Gapinski:

According to Ohio EPA records, on September 25, 1992, the Director of Ohio EPA approved a closure plan submitted by General Electric Co. for the hazardous waste drum storage unit at the Ohio Lamp Plant, Warren, Ohio. Ohio EPA received certification documents on May 21, 1993 stating that the hazardous waste drum storage unit had been closed according to the specifications of the approved closure plan. Ohio EPA District Office personnel completed a certification of closure inspection and a review of documents pertaining to the hazardous waste drum storage unit July 12, 1993. Based on this inspection and review, the Ohio EPA has determined that the hazardous waste drum storage unit has been closed in accordance with the approved closure plan and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC). General Electric Co., Ohio Lamp Plant, will no longer be considered a treatment, storage & disposal facility (TSDF), but will continue to operate as a large quantity generator (LQG) of hazardous waste.

General Electric Co., Ohio Lamp Plant, should continue to use the assigned U.S. EPA ID No. for purposes of Ohio EPA manifest, recordkeeping and reporting requirements as appropriate.

As specified in OAC Rule 3745-66-40, General Electric Co., Ohio Lamp Plant, will not be required to maintain financial assurance for closure costs and liability coverage for accidental occurrences at this facility, in accordance with OAC Rules 3745-66-43(H) and 3745-66-47(E).

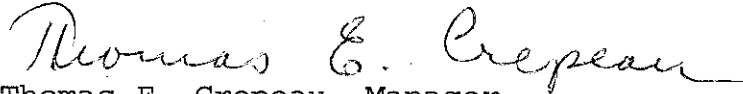
Please note that this letter does not relieve General Electric Co., Ohio Lamp Plant, of any corrective action responsibilities that may be required.



Printed on recycled paper

Please contact the Ohio EPA, Northeast District Office, Attn: Adrienne La Favre, 2110 E. Aurora Road, Twinsburg, Ohio 44087, tel: 216-425-9171 if you have any questions concerning the closure process or the facility's status.

Sincerely yours,

A handwritten signature in cursive script that reads "Thomas E. Crepeau".

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

cc. Harriet Croke, U.S. EPA, Region 5 ✓
Randy Meyer, DHWM
Beth Barrett, DHWM
Adrienne La Favre, NEDO

**RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: GE- Ohio Lamp { Howard Russell }

USEPA I.D.: OHID 066 052 804 HWFB No.: 02-78-0153

Street: 1210 N. Park

City: Warren State: Ohio Zip: 44483

County: Trumbull Telephone: 373-1400

Owner/Operator: _____

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____

Inspection Date: 7/19/91 Time: 10:10am - 3pm

Advance notice of inspection given? (yes) _____ (no) ☒

If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Nancy Zikmanis</u>	<u>OEPA/Env. Scienc.</u>	<u>425-9171</u>
	<u>Karen Nesbitt</u>	<u>" "</u>	<u>" "</u>
Facility Representative:	<u>Howard Russell</u>	<u>GE / Env. Spc</u>	<u>373-1400</u>
	<u>Bob Haydak</u>	<u>" "</u>	<u>" "</u>
	<u>Bill Jones</u>	<u>" "</u>	<u>" "</u>
	<u>Mike Smalinsky</u>	<u>" "</u>	<u>" "</u>

STATUS

Cond. Exempt SQG _____ SQG _____ Large Quantity Generator _____

LDR Checklist Attached: (yes) ☒ (no) _____

ACTIVITIES

Containers ☒

Tanks _____

Wastepile _____

Landfill _____

Surface Impoundment _____

Used oil burner _____

Hazardous waste fuel burner/blender _____

Incineration/Thermal treatment _____

Land treatment _____

Groundwater monitoring _____

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

Manufacture incandescent lamps. various sizes

Wastes

* Lamp Bases - D008 - CWM - Ft Wayne, In (2 1/2 wks) * (Exp 5-92)
Flammable - D001 F003 - CWM - Resource Recovery - Variance to be
FO05 w. Canister, O Landfilled - (Tyrone,
to recycle)

Getter Contain

Rags & Bottle - D001 - CWM - Emelle, AL

Petrol Naphtha - D001 - Safety Kleen, Youngstown

Methanol, Amyl Acetate - D001 - CWM - Chicago, Ill

** Variance for Pb in EPA regulations - 40 CFR 268.41(A)
- checking w/ Laurie Stevenson C/O - Secondary Smelting
* Don't believe it applies *

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) ✓

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

OR;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) ✓ (no) _____

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

See page #2.

ON SITE MANAGEMENT

OFF SITE MANAGEMENT

[illegible]

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11 (A) (B) and (C)?

Y _____

If not, specify those waste streams which the generator has failed to adequately evaluate: *Knowledge, TCLP*

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

Y _____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

Wastewater Treatment - Acid Stripping of Silver

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?

N _____

If so, please identify these waste streams below:

4. Is the generator recycling any materials on-site by:
- Using or reusing the material as an ingredient in an industrial process to make a product?
 - If so, is the material being reclaimed before it is used or reused?
 - Using the material as a substitute for commercial products?
 - Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - If so, is the material reclaimed before returning to the original process?

N _____

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

Y _____

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

acids

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the Land Disposal Restriction Checklist.

Y _____

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?

Y _____

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y _____

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

9. Does the generator import or export hazardous waste?

N _____

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60?

N/A _____

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

Y/N/NA RMK #

10. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

- a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32]?
- b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32?
- c. The generator meets the requirements for proper DOT
placarding or offers the appropriate DOT placards to
the initial transporter in compliance with 3745-52-33?

Y _____

Y _____

Y _____

REMARKS - PRETRANSPORT REQUIREMENTS

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

Y _____

If not, specify those waste streams which the generator has failed to adequately evaluate: *Knowledge, TCLP*

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

Y _____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

Wastewater Treatment - Acid Stripping of Silver

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?

N _____

If so, please identify these waste streams below:

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52(A) (B) (C) (D) (E)]:
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? Y _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y _____
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y _____
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A) (B)] Y _____
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y _____
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] Y _____

Howard
Russell

Y/N/NA RMK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?

N/A _____

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)] Y _____
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)] Y _____
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)] Y _____
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)] Y _____

REMARKS - PERSONNEL TRAINING REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)]
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]
 - a. Internal alarm system?
 - b. Access to telephone, radio or other device for summoning emergency assistance? *2 way radio*
 - c. Portable fire control equipment, spill control and decontamination equipment?
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]

Y _____

N _____

N/A _____

Y _____
Y _____
Y _____
Y _____

Y _____

Y _____

Y _____

Y _____

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

N/A _____

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y _____

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y _____

N/A _____

N _____

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

N/A _____

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

Y _____ using 5 gal cans

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

Y _____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

Area in Oil room - claimed Satellite Acc -

Not Satellite Accum - not under operator - notified facility - - Stated waste moved off-site before 90 days even at "First Drop" Status.

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

- a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A) (3)]
- b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A) (2)]

N _____
N _____

In addition, OAC 3745-52-34(A) (1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? N _____

If so, OAC 3745-52-34(A) (1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Storage and Treatment in Tanks checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? N _____

- a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? N/A _____

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)

Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are:
 - a. Closed? [3745-66-73(A)] Y
 - b. In good condition? [3745-66-71] Y
 - c. Compatible with wastes stored in them? [3745-66-72] Y
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] Y
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] Y
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
 - a. Date and time of inspections? Y
 - b. Name of inspector? Y
 - c. Notation of observations made during the inspection? Y
 - d. The date and nature of any repairs or other remedial action? Y
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
 - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Y
 - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] N

Variance
- from EPA C
Fire Dept

N/A

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N _____

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)]

N _____

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

REMARKS - GENERATOR CLOSURE REQUIREMENTS

*Closure of >90 day storage area - almost ready to
certify*

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)? Y
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? Y
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)? Y
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)? Y
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter? Y
 - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42? NA
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? Y

REMARKS - MANIFEST REQUIREMENTS

had east sampling
awaiting EPA OK
to certify closure.

In Closure of
Interim Status
Drum Storage Pad.

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: GE- Ohio Lamp
USEPA I.D.: OH0066052804 HWFB No.: 02-78-0153
Street: 1210 N. Park
City: Warren State: OH Zip: 44483
County: Tuscarawas Telephone: 373-1400
PUCO No.: _____

Owner/Operator: _____
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____

Inspection Date: 7/19/91 Time: 10 - 3

Advance notice of inspection given? (yes) _____ (no) ☒
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	<u>Darryl Zikmonis</u>	<u>OEPA/Env Scientist</u>	<u>425-9171</u>
	<u>Karen Neelut</u>	<u>" "</u>	<u>" "</u>
Facility Representative:	<u>Howard Russell</u>	<u>GE-Ohio Lamp</u>	<u>373-1400</u>
	<u>Bill Jones</u>		
	<u>Bob Hajek</u>		
	<u>Therese Smolin</u>		

STATUS

Cond. Ex. SQG _____ SQG _____ Large Quantity Generator _____
Treatment _____ Storage _____ Disposal _____ Transporter _____
Part A Permit: (yes) ☒ (no) _____ Part B Permit: (yes) _____ (no) ☒
LDR Checklist Attached: (yes) ☒ (no) _____

ACTIVITIES

Containers _____	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

Revised: 1/7/91

OFF SITE MANAGEMENT

ON SITE MANAGEMENT

DESCRIPTION OF WASTE

REMARKS - GENERAL INFORMATION

Include list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

*Facility Report filed for 1991 - No Waste in
closure - ready to certify*

PERMIT STATUS

Y/N/NA RMK#

Has the facility submitted a Part A application to Ohio
DPA in accordance with OAC 3745-50-40?

Y _____

When was the facility's Part A submitted:

Is the facility operating in compliance with the terms
and conditions of its HWFB permit?

Y _____

If not, has a Permit Change Request (PCR) been submitted
in accordance with 3745-50-51?

N/A _____

If yes, what date was the PCR submitted? _____

N _____

Has the facility submitted a Part B?

KS - PERMIT STATUS

Y/N/NA RMK ‡

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) which contains the following information:

- a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B) (1)]
- b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
- c. The estimated (or actual) weight, volume or density of the waste material?
- d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745?
- e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
- f. Records of incidents which required implementation of the Contingency Plan?
- g. Records of any waste analyses and trial tests required to be performed?
- h. Records of the inspections required under the General Inspection Requirements under 3745-65-15?
- i. Records of any monitoring, or analytical data required under other Subparts as referenced by 3745-65-73(B) (6)?
- j. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers?
[3745-65-73(B) (2)]
- k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)?
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42?
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

Y	_____
Y	_____
Y	_____
Y	_____
Y	_____
NA	_____
Y	_____

REMARKS - MANIFEST REQUIREMENTS

Rid last sampling -
awaiting EPA OK
to certify closure.

In Closure of
Interim Status
Drum Storage Pad.

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: GE- Ohio Lamp
USEPA I.D.: CHD 066 052 804 HWFB No.: 02-78-0153
Street: 1210 N. Park
City: Warren State: OH Zip: 44483
County: Trembly Telephone: 373-1400
PUCO No.: _____

Owner/Operator: _____
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____

Inspection Date: 7 19 91 Time: 10 - 3

Advance notice of inspection given? (yes) _____ (no) ☒
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	<u>Danny Zikmanis</u>	<u>OEPA/Env. Scientist</u>	<u>425-9171</u>
	<u>Karen Nesbitt</u>	<u>" "</u>	<u>" "</u>
Facility Representative:	<u>Howard Russell</u>	<u>GE-Ohio Lamp</u>	<u>373-1400</u>
	<u>Paul Jones</u>		
	<u>Bob Hajdich</u>		
	<u>Mike Smolin</u>		

STATUS

Cond. Ex. SQG _____ SQG _____ Large Quantity Generator _____
Treatment _____ Storage _____ Disposal _____ Transporter _____
Part A Permit: (yes) ☒ (no) _____ Part B Permit: (yes) _____ (no) ☒
LDR Checklist Attached: (yes) ☒ (no) _____

ACTIVITIES

Containers _____	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES. -

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B) (1)]
 - b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
 - c. The estimated (or actual) weight, volume or density of the waste material?
 - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745?
 - e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
 - f. Records of incidents which required implementation of the Contingency Plan?
 - g. Records of any waste analyses and trial tests required to be performed?
 - h. Records of the inspections required under the General Inspection Requirements under 3745-65-15?
 - i. Records of any monitoring, or analytical data required under other Subparts as referenced by 3745-65-73(B) (6)?
 - j. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B) (2)]
 - k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

N/A

NOTE: THE FOLLOWING RECORDKEEPING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

Y/N/NA RMK #

2. Are manifests received by the facility signed and dated?
[3745-65-71(A)(1)]
3. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]
 - a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?
 - b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?

N/A	

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so,

- a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]
- b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]
- c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,

- a. Is the schedule kept at the facility? [3745-65-15(B)(2)]
- b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)]
- c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)]

N/A	

REMARKS - GENERAL INSPECTION REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the facility provide a Personnel Training Program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?
2. Does the facility provide Personnel Training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?
4. Does the facility keep all of the records required by 3745-65-16(D) (E) including written job titles, job descriptions and documented employee training records?

see generator sheets

REMARKS - PERSONNEL TRAINING

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52 (A) (B) (C) (D) (E)]
 - a. Actions to be taken by personnel in the event of an emergency?
 - b. Arrangements or agreements with local or state emergency authorities?
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
 - d. A list of all emergency equipment including location, physical description and outline of capabilities?
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]?
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)]
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)]
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55]

*see generator
sheets*

Y/N/NA REMARK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J)?

N/A _____

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

See generator sheets

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] _____
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? _____
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)] _____
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32 (A) (B) (C) (D)]
 - a. Internal alarm system? _____
 - b. Access to telephone, radio or other device for summoning emergency assistance? _____
 - c. Portable fire control equipment, spill control and decontamination equipment? _____
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? _____
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] _____
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs? _____
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-65-34] _____
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] _____
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] _____

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

N/A _____

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] Y _____
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] Y _____

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -
 - a. A 24-hour surveillance system, or; Y _____
 - b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)] Y _____
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)] Y _____

REMARKS - SECURITY REQUIREMENTS

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE
WASTES (OAC 3745-65-17)

Y/N/NA RMK #

1. If ignitable, reactive or incompatible wastes are handled,
does the facility meet the following requirements?
[3745-65-17]

a. Wastes are protected from sources of ignition and/or
reaction?

Y _____

b. Physical separation of incompatible waste materials?

Y _____

c. "No Smoking" or "No Open Flames" signs are placed
near areas where ignitable or reactive wastes are
handled?

Y _____

d. Commingling of waste materials is done in a controlled,
safe manner as prescribed by 3745-65-17(B)?

N/A _____

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

SPECIAL REQUIREMENTS
IGNITABLE/REACTIVE/INCOMPATIBLE WASTES

OAC 3745-66 CLOSURE AND POST CLOSURE

*I'm Closure
ready to certify
if OEPA OKS
Mercury levels*

Y/N/NA RMK #

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?
 - a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?
 - b. A description of how final closure will meet the requirements of 3745-66-11?
 - c. An estimate of the maximum amount of hazardous waste ever in inventory?
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?
 - e. The year closure is expected to begin and a schedule for the various phases of closure?
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]
4. Has the closure plan (and post-closure plan, if applicable) for tank, container storage or incinerator units been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16? _____

9. What permitted units at the facility have been closed in accordance with an approved Closure Plan? _____

10. If closure was partial, list the regulated units which remain in use at the facility: _____

11. If required, has the facility prepared a written post-closure plan? [3745-66-18] _____

If so, does the post-closure plan include:

a. A description of proposed ground water monitoring? _____

b. A description of planned maintenance activities? _____

c. The name, address and phone number of person/office to contact during the post-closure period? _____

12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] _____

13. Has the owner of the property on which a disposal unit is located recorded on the deed that:

a. The land has been used to manage hazardous waste and the type, quantity and location of waste? _____

b. Land use is restricted under closure and post-closure rules? [3745-66-19] _____

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: GE-Ohio Lamp
 U.S. EPA ID No.: OH 066 052 804
 Street: 1210 N Park
 City: Warren State: OH Zip: 44483
 Telephone: _____

Inspection Date: 7/19/91 Time: 1:45 (am/pm)

Weather Conditions: Warm Sunny

	Name	Agency/Title	Telephone
Inspectors:	Nancy Zikmonis	OEPA/Env. Scientist	425-9171
	Karen Nesbit	OEPA/Env. Scientist	(216) 425-9171
Facility Representatives:	Howard Russell	GE/Manuf. + Envir. Eng.	(216) 373-1400
	Bob Hagstake		

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	✓	_____	_____	_____	_____

* See Appendix A

* Can't evaluate D008 compliance with
 Land Ban regulations since don't have EpTox
 analysis. 1

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☐ No ☐ NA ☒

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D008			<input checked="" type="checkbox"/> - land filled w/ variance
D001			<input checked="" type="checkbox"/> expires 5/92
D001, D039			<input checked="" type="checkbox"/> * checking w/ Columbus

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ___ No ___ NA ☒

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ☒

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ___ No ___ NA ☒

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥ 500 ppm PCBs

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☐ No ☒

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☒ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ☒ No ☐

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☐

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☒ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☐ No ☐ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
-------------------	--------------------------	--------------------------------------

- 2 Are treatment residuals generated from these units?

Yes _____ No _____

Comments

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

1. What is the main purpose of the document?
 2. What are the key findings of the study?
 3. What are the limitations of the study?
 4. What are the implications of the study?
 5. What are the conclusions of the study?
 6. What are the recommendations of the study?
 7. What are the future research directions?
 8. What are the acknowledgments?
 9. What are the references?
 10. What are the appendices?
 11. What are the footnotes?
 12. What are the tables?
 13. What are the figures?
 14. What are the captions?
 15. What are the legends?
 16. What are the abbreviations?
 17. What are the acronyms?
 18. What are the symbols?
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IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
California List Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☐

3. What date was the waste analysis plan last revised? ____/____/____

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☐ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☐ Generator provides data
☐ Facility performs analyses in on-site laboratory
☐ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☐ No ☐ NA ☐

If analyses are conducted off site, identify lab: _____

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☐ NA ☐

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☐ No ☐ NA ☐

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☐ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☐ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ☐ No ☐ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If Yes, go to 3.)

4. Describe all other waste codes and treatment processes:

Waste Code

Treatment Processes

_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes _____

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments _____

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ___ No ___ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ___ No ___

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____

Case-By-Case Extension (40 CFR 268.5) _____

No-Migration Petition (40 CFR 268.6) _____

Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(b)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ___ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes _____ No _____

Comments _____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(2)]

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage

___ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ___ No ___

(If yes, the Generator checklist must also be completed.)

- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ___ No ___ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units or Process</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes ___ No ___

Comments _____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ___ No ___ NA ___

(If Yes, the TSD checklist must also be completed.)

Fax Transmittal Memo

To Nancy Zikmanis
 Company OHIO EPA

Local _____
 Fax # (216) 487-0769 Telephone # _____

Comments TCLP test results for
75 watt and 100 watt light bulbs per your request to
Howard Russell.

7672 No. of Pages

Today's Date 7/10/91

Time _____

From

Howard Russell

Company

G.E. LIGHTING

Location

Dept. Charge _____

Fax # _____

Telephone # _____

Original
Disposition☐ Destroy☐ Return☐ Call for pickup

GE LIGHTING
 LIGHTING ENVIRONMENTAL LABORATORY
HAZARDOUS WASTE TESTING RESULTS

PLANT

Ohio Lamp

PROCESS GENERATING WASTE

100 watt bulbs, Glass and base

LAB NUMBER

9000.26

DATE ANALYZED

8/6/90

ANALYST

Daisy Jackson

TEST TYPE: EP _____

TCLP ☒EPA
WASTE
NUMBER

CONSTITUENT

SAMPLE
(mg/L)MAXIMUM
CONCENTRATION
(mg/L)LOWER
DETECTION
LIMIT

D004

Arsenic

5.0

0.01

D005

Barium

100.0

0.4

D006

Cadmium

1.0

0.03

D007

Chromium

5.0

0.1

D008

Lead

147

5.0

0.2

D009

Mercury

0.2

0.001

D010

Selenium

1.0

0.01

D011

Silver

5.0

0.06

OTHER METALS TYPICALLY ANALYZED:

CONSTITUENT

(mg/L)

Antimony

Copper

Nickel

Zinc

NOTES:

HAZARDOUS WASTE TESTING RESULTS

EPA WASTE NUMBER	CONSTITUENT	SAMPLE (mg/L)	MAXIMUM CONCENTRATION (mg/L)	LOWER DETECTION LIMIT
D004	Arsenic	_____	5.0	0.01
D005	Barium	_____	100.0	0.4
D006	Cadmium	_____	1.0	0.03
D007	Chromium	_____	5.0	0.1
D008	Lead	<u>41</u>	5.0	0.2
D009	Mercury	_____	0.2	0.001
D010	Selenium	_____	1.0	0.01
D011	Silver	_____	5.0	0.06

<u>CONSTITUENT</u>	<u>(mg/L)</u>
Antimony	_____
Copper	_____
Nickel	_____
Zinc	_____

- 1) Instrument conditions and/or matrix effects exist which raise the Lower Detection Limits above normal levels indicated.
- 2) Above analysis represents waste characteristics for the submitted sample and noted process. Should significant changes in the process occur which may influence the constituents of the hazardous waste, another analysis may be necessary in accordance with your waste analysis plan.
- 3) Not all constituents are analyzed on every sample. Process knowledge may be used on other constituents.

My Z. Lind
Laboratory Director



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 963-1200 (216) 425-9171
FAX (216) 487-0769

RECEIVED

AUG 28 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RECEIVED
WMD RECORD CENTER

JUL 19 1994

George V. Voinovich
Governor

July 15, 1991

Howard Russell
GE - Ohio Lamp Plant
1210 North Park Avenue
Warren, OH 44483

RECEIVED
OHIO EPA

JUL 17 1991

DIV. OF SOLID & HAZ. WASTE MGT.

RE: TRUMBULL COUNTY
OHD 066-052-804
GENERATOR, TSD
NOTICE OF VIOLATION

CERTIFIED MAIL

Dear Mr. Russell:

On July 9, 1991, Karen Nesbit and I, representing the Ohio EPA, conducted a RCRA compliance inspection of GE-Ohio Lamp Plant in Warren, Ohio. Bill Jones, Bob Hajclak and Mike Smolinsky, representing GE, began our inspection with us. You returned in the afternoon to complete the inspection with us. GE-Ohio Lamp Plant manufactures incandescent light bulbs of various sizes. The wastestreams include painting solvents (D001) and paint (D039), getter solution (D001), rags and other materials contaminated by hazardous waste (D001), and lead bases of lights (D008). All of the wastes on-site are containerized. The liquids (D001/D039) and the contaminated rags and bottles (D001) are stored in 55-gallon drums or in 5-gallon containers for satellite accumulation. The getter solution and getter contaminated rags and bottles are disposed of by Chemical Waste Management (CWM)-Resource Recovery in West Carrollton. The D001/D039 waste petroleum naphtha from the machine shop is disposed of by Safety Kleen in Youngstown. The lead bases are disposed of at CWM-Chemical Services, Inc.-Adams Center Landfill in Model City, New York.

During our inspection, the following violations were noted:

- 1) Satellite Accumulation - OAC 3745-52-34(C):
All satellite accumulation containers must be marked with the words "Hazardous Waste" or with other words identifying the contents of the containers. The drums in the flammable solvent cabinets, the small 5 gallon containers and the hazardous waste contaminated rags and bottles container must all be labeled. Photographs of these types of containers labeled is required to document a return to compliance.

Page - 2 -
Mr. Howard Russell
July 15, 1991

- 2) Accumulation in Containers - OAC 3745-52-34(A)(2) and (3): Accumulation containers must be labeled as "Hazardous Waste" and be clearly marked with the date accumulation began. There were three drums in the storage room which were not labeled. Also, all storage containers and the roll-off box holding the lead bases must be labeled. These containers must be labeled and a photograph sent to this office to verify return to compliance.

GE-Ohio Lamp needs to submit Ep Toxicity results for the lead bases of lights in order for the OEPA to determine their compliance with the Land Disposal Restriction regulations and other applicable hazardous waste regulations. The national capacity variance, which GE is claiming for their D008 waste, is for D008 - lead materials stored before secondary smelting or if the materials are below the Ep Toxicity Pb level, but above the TC-Pb level. In a phone conversation on July 11, 1991, you stated that no Ep Toxicity analysis was ever done on this wastestream.

It was also stated that the manufacturing process which generates this wastestream has not changed. This information will allow the OEPA to make a determination of GE's D008 wastestreams regulatory status. The Ep Toxicity results should be sent with the corrective action documentation for the cited violations.

The above violations must be addressed and documentation of GE-Ohio Lamp's corrective actions sent to the Ohio EPA by August 16, 1991.

Please be advised that instances of non-compliance can continue as subjects of pending or future enforcement actions.

If you have any questions, please feel free to contact Sherry Slone or me at (216) 963-1200.

Sincerely,

Nancy Zikmanis

Nancy Zikmanis for Sherry Slone
Environmental Scientist
Division of Solid and Hazardous
Waste Management

NZ.wb

cc: Sherry Slone, DSHWM, NEDO
Harry Courtright, DSHWM, NEDO
Laurie Stevenson, DSHWM, CO

SEP 8 - 1989

5HR-12

Mr. Howard H. Russell
General Electric Company
Ohio Lamp Plant
1210 North Park Avenue
Warren, Ohio 44483

Re: Return to Compliance
GE - Ohio Lamp Plant
OHD 066 052 804

Dear Mr. Russell:

We have received and reviewed your letter of August 23, 1989, regarding our Notice of Violation (NOV) dated August 11, 1989.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our August 11, 1989, NOV.

If you should have any further questions, please contact Ann Budich of my staff at (312) 353-6844.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program
Section

cc: Mike Savage, OEPA
Mark Bergman, NEDO

bcc: Sally Swanson, REB

5HR-12 budich :pw:6-8093::DISK "A":FILENAME:ge

4/1
9/5/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	al 9-5-89	SLS 9-7-89	



INCANDESCENT
LAMP
DEPARTMENT

GENERAL ELECTRIC COMPANY, 1210 NORTH PARK AVENUE, WARREN, OHIO 44483
Phone (216) 373-1400

OHIO LAMP PLANT

August 23, 1989

Ms. Ann Budich
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: 5HR-12

Dear Ms. Budich,

In response to your letter dated August 11, 1989,
Subject: Notice of Violation, please find attached revision H.
to our Waste analysis plan.. This revision will address the
requirements of 40 CFR Part 268.

Thank you for your assistance in this matter.

Sincerely yours,


Howard H. Russell
Team Engineer
Ohio Lamp Plant

HHR/cw

cc: Mike Savage, OEPA
Mark Bergman, Northeast District Office



GENERAL ELECTRIC

INCANDESCENT
LAMP
DEPARTMENT

GENERAL ELECTRIC COMPANY, 1210 NORTH PARK AVENUE, WARREN, OHIO 44483
Phone (216) 373-1400

OHIO LAMP PLANT

August 23, 1989

Ms. Ann Budich
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: 5HR-12

Dear Ms. Budich,

In response to your letter dated August 11, 1989,
Subject: Notice of Violation, please find attached revision H.
to our Waste analysis plan.. This revision will address the
requirements of 40 CFR Part 268.

Thank you for your assistance in this matter.

Sincerely yours,



Howard H. Russell
Team Engineer
Ohio Lamp Plant

HHR/cw


cc: Mike Savage, OEPA 
Mark Bergman, Northeast District Office

EXHIBIT I

PAGE 6

H. Notification to disposer that restricted waste requires treatment:

Under the requirements of 40 CFR Part 268, restricted wastes which include the spent solvent wastes coded F001-F005 must be treated to meet specified standards before they can be land-filled or otherwise disposed of.

Since we do not treat or dispose of wastes on site, a notification to the disposer that our restricted waste must be treated is to be completed and forwarded with each manifested shipment of the restricted waste. A copy of the form and instructions are attached.

A copy of the completed notification will be filed with the restricted waste shipping manifest for a minimum of three (3) years.

Contracts from the disposer will include a copy of the required form, assisting in the identification of the wastes that require this notification.

EXHIBIT I

PAGE 6

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Contracts from the disposer will include a copy of the required form, assisting in the identification of the wastes that require this notification.

AUG 11 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Howard Trumbull
General Electric Company
Ohio Lamp Plant
1210 North Park Avenue
Warren, Ohio 44483

Re: Notice of Violation
GE-Ohio Lamp Plant
OHD 066 052 804

Dear Mr. Trumbull:

On February 28, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California List wastes which became effective on July 8, 1987. Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988. Regulations are set forth at 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, we have determined that the requirements of the land disposal restriction regulations are being violated.

The facility did not revise its waste analysis plan to meet the requirements of 40 CFR Part 268, as required under 40 CFR Part 265.13. Waste analysis plans must contain all the information which must be know to treat, store, or dispose of waste in accordance with the requirements of 40 CFR Parts 264.13, and 268. Please provide this office with a copy of your revised waste analysis plan addressing the requirements of 40 CFR Part 268.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation documentation demonstrating that the above-cited violation has been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violation may subject the facility to further enforcement action.

Please direct your response and any questions you may have to Ms. Ann Budich of my staff at (312) 353-6844.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Mark Bergman, Northeast District Office

bcc: Sally Swanson, REB

5HR-12:A.BUDICH:sm:6-8092:06/30/89:DISK #N: FILENAME: TRUMBULL

July 25

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	ab 7-25-89	SKS 8-3-89	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: GE - OHIO LAMP

U.S. EPA I.D. No.: OH-D-066-052-804

Street: 1210 NORTH PARK AVE.

City: WARREN State: OHIO Zip Code: 44483

Telephone: (216) 373-1400

Operator: GE - OHIO LAMP

Street: 1210 NORTH PARK AVE.

City: WARREN State: OHIO Zip Code: 44483

Telephone: (216) 373-1400

Owner: GENERAL ELECTRIC COMPANY

Street: 3135 EASTON TURNPIKE

City: FAIRFIELD State: CT. Zip Code: 06431

Telephone: _____

Inspection Date: 2/28/89 Time: 9:00 - A.M. Weather Conditions: COLD/CLEAR

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>M. BERGMAN</u>	<u>OHIO EPA</u>	<u>(216) 425-9171</u>

Facility Representatives: HOWARD RUSSELL

JOHN NEWILL

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	_____	_____	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	_____	_____	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

Facility is a manufacturer of incandescent lamps. Primarily generate flammable liquids, solids and caustic wastes. Occasionally generate mercury contaminated oils. Facility does attach land ban forms to manifests.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	_____	_____	_____	_____	_____
2. F002	_____	_____	_____	_____	_____
3. F003	<u>X</u>	_____	<u>X</u>	_____	_____
4. F004	_____	_____	_____	_____	_____
5. F005	<u>X</u>	_____	<u>X</u>	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes N/A

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic 500 mg/L	_____	_____	_____	_____	_____
Cadmium 100 mg/L	_____	_____	_____	_____	_____
Chromium VI 500 mg/L	_____	_____	_____	_____	_____
Lead 500 mg/L	_____	_____	_____	_____	_____
Mercury 20 mg/L	_____	_____	_____	_____	_____
Nickel 134 mg/L	_____	_____	_____	_____	_____
Selenium 100 mg/L	_____	_____	_____	_____	_____
Thallium 130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L *N/A*

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 *N/A*

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to *N/A*

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes? *N/A*

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids) *N/A*

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing
☒ spent methylene chloride
☐ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

N/A

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
U151	<input type="checkbox"/>	<input checked="" type="checkbox"/>
U154	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. TEST DATA

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: SPENT GELTER

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

ANNUAL TESTING REQUIRED UNLESS
PROCESS SHOULD CHANGE.

2. California List Wastes N/A

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing ☐ Yes ☐ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes ☐ No ☐ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes ☐ No ☐ Soft hammer

If yes, specify the waste stream: SPENT GETER/MERCURY CONTAMINATED OIL

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. MSDS SHOWS INCOMING MATERIALS.

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

☒ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

NOV. 3, 1988

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ☒ No ____ NA

- d. How does the generator test the waste when a process or waste stream changes?

TESTED ANNUALLY UNLESS THEIR
IS A PROCESS CHANGE

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: _____

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☐ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: NON- HAZARDOUS
SLUDGE GOES TO ADAMS CENTER
LANDFILL

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☒ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ NoThe corresponding treatment standards
and all applicable prohibitions ☐ Yes ☐ NoManifest number ☐ Yes ☐ NoWaste analysis data, if available ☐ Yes ☐ NoDate the waste is subject to the
prohibitions ☐ Yes ☐ Noj. Does the generator retain copies of all notices and certifications for
a period of 5 years?☐ Yes ☐ NoD. Demonstration and Certification -- "Soft Hammer" Wastes

N/A

a. Has the generator attempted to locate and contract with treatment
and recovery facilities that provide treatment that yields the
greatest environmental benefit [268.8(a)(1)]?☐ Yes ☐ Nob. Has the generator submitted to the Regional Administration a
demonstration and certification containing the following information
to document its efforts to locate practically available treatment:A list of facilities and facility
officials contacted? ☐ Yes ☐ NoAddresses ☐ Yes ☐ NoTelephone Numbers ☐ Yes ☐ NoContact dates ☐ Yes ☐ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available
treatment for its wastes, has it sent documentation to EPA
demonstrating why it was not able to obtain treatment or recovery
for the waste?☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

____ Yes ____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

____ Yes ____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

____ Yes ____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number ____ Yes ____ No

(ii) Manifest number ____ Yes ____ No

(iii) Waste analysis data, if available ____ Yes ____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

____ Yes ____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

X Yes ____ No

If yes, list types of waste treatment units and processes:

SILVER COATING RINSEWATERS ARE
NEUTRALIZED, FLOCCULATED & DISCHARGED
TO S.T.P.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

N/A

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA
 o California List ☐ Yes ☐ No ☒ NA
 o First Third ☐ Yes ☒ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? 1980

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: NELA PARK LAB

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☒ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: ANNUAL UNLESS
PROCESS CHANGES

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☒ Tanks
☐ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☒ Yes ☐ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes X No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect? N/A

____ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record? N/A

____ Yes ____ No ____ NA

C. Treatment

N/A

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments N/A

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

- d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal N/A

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH D066052804

Facility: G.E. Co. Ohio Lamp Plant Address: 1210 North Park Ave City: Warren
 State: Ohio Zip Code: 44483 County: Trumbull Telephone: 216/373-1400
 Facility Operator: same Title: _____ Telephone: _____

Facility Owner: G.E. Co - Nela Park Address: Nela Park, Noble Road
 City: East Cleveland State: Ohio Zip Code: 44112 Telephone: 216/266-2111
 Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-78-0153

Date of Inspection: 8/3 Time of Inspection: (Start) 9:30 (Finish) 10:30

Advance Notification? ☐ No ☒ Yes

Weather Conditions: _____

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Ron Davis</u>	<u>Foreman, Bldg & Grounds</u>	<u>216/373-1400</u>
2.	<u>Robert Whitmore</u>	<u>Mgr. Mfg. Engineering</u>	<u>216/373-1400</u>
3.	_____	_____	_____
4.	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

(Name)

(Title)

(Telephone)

1. Helen Takacs Environmental Scientist 216/425-9171
2. _____
3. _____
4. _____

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. _____ Treatment
D. _____ Transportation E. _____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: FO02, U154

b) Non-Listed Wastes: ☒ D001 ☐ C ☒ D003 ☐ T ☐ D000

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No
4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?
☒ Yes, See Remark # _____ ☐ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?
____ Yes, See Remark # ____ ✓ No
6. Does this facility transport hazardous waste materials off-site for itself or other generators?
____ Yes, Complete Part 3 (Transp.) ✓ No
- a) Applicable U.S. EPA I.D. Number _____
- b) Ohio P.U.C.O. GR TRSF Number _____
7. A brief description of site activity:
manufacturing of incandescent lamps

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. The generator meets the following hazardous waste pre-transport requirements:

a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A). ☒

b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B. ☒

c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33. ☒

6. The generator meets the following recordkeeping and reporting requirements:

a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B. ☒

b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable. ☒

7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50. ☒

8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met: ☒

a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking. ☒

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.			✓	
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).			↓	
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.			↓	
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-8 and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.			✓	
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).			↓	
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).			↓	
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).			↓	
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓			
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓			

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

✓ no tanks

NOTE:

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) 24-hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.16 and 3745-55-15)

a) Inspect emergency equipment. ☒ ☐ ☐

b) Inspect monitoring equipment. ☒ ☐ ☐

c) Inspect security, alarm and communication devices. ☒ ☐ ☐

d) Inspect process equipment (pipes, pumps, etc.). ☐ ☐ ☒

e) Inspect containment structures (dikes, curbs, etc.). ☐ ☐ ☒

f) Inspect facility for structural malfunctions (roof, floor, etc.). ☐ ☐ ☒

g) Inspect hazardous waste handling/loading areas each day used. ☒ ☐ ☐

h) Record of any malfunctions due to equipment or operator errors. ☐ ☐ ☒

i) Record of any hazardous waste discharges. ☐ ☐ ☒

5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. ☒ ☐ ☐

6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records. ☒ ☐ ☐

7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17). ☒ ☐ ☐

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Internal alarm system.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Subpart D: Contingency and Emergency</u>				
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Actions to be taken by personnel in the event of an emergency incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Arrangements or agreements with local or state emergency authorities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) The estimated (or actual) weight, volume or density of the waste material(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark#</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77). ☒

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71). ☒

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	✓	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	—	—	✓	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	—	—	✓	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	✓	—

Subpart F: Groundwater Monitoring

N/A

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:	—	—	—	—
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

- b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C. N/A
- c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D. —

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

Yes No N/A Remark #

1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03) ✓

- a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1). ✓

- b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out. ✓

- c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. ✓

- d) A description of steps taken to decontaminate facility equipment. ✓

- e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed. ✓

2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. ✓ no changes

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	—	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	—	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	—	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	—	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an Independent Professional Engineer (265.115 and 3745-56-06).	—	—	—	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES. *D/A*

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	—	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	—	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	—	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers
J: Management of Tanks
K: Surface Impoundments

L: Waste Piles
M: Land Treatment
N: Landfills

O: Incinerators
P: Thermal Treatment
Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

Yes No N/A Remark #

1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53). ☒ ☐ ☐

2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54). ☒ ☐ ☐

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

Yes No N/A Remark #

3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56). ☐ ☐ ☐

4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B). ☒ ☐ ☐

RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes No N/A Remark #

✓ — — —

Remark # 1. The facility has received written documentation from the Columbus office that they satisfy the intent of the regulation even though they are within 50 feet of the property line. The material is stored in a fireproof room.

21 JUNE 1983 1.00 P.M.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

Facility: GE- OHIO LAMP PLANT Address: 1210 NORTH PARK AVE. City: WARREN
State: OHIO Zip Code: 44483 County: TRUMBULL Telephone: (216) 373-1400

HMFBAB #02-78-0153

U.S. EPA I.D. # OHDO66052804

INSPECTION PARTICIPANTS(S)

(Name)	(Title)	(Telephone)
1. <u>ROBERT WHITMORE</u>	<u>MGR. MANUFACTURING ENG.</u>	<u>(216) 373-1400</u>
2. <u>HOWARD RUSSELL</u>	<u>SUPERVISOR M.W.M.</u>	<u>(216) 373-1400</u>
3. <u>JOHN FEDCHOCK</u>	<u>SAFETY & ENVIRONMENTAL</u>	<u>(216) 266-8904</u>
INSPECTOR(S)		
1. <u>MARK BERGMAN</u>	<u>OHIO EPA</u>	<u>(216) 425-9171</u>
2.		
3.		

INSTALLATION ACTIVITY

If the site is a TSDF, check the boxes indicating which regulations are applicable.

<input type="checkbox"/> Generator only (G)	<input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure	<input type="checkbox"/> Waste Piles S03
<input type="checkbox"/> Transporter (T)		<input type="checkbox"/> Land Treatment D81
<input type="checkbox"/> TSDF only		<input type="checkbox"/> Landfills D80
<input type="checkbox"/> G-T		<input type="checkbox"/> Chemical/Physical/Biological T04
<input checked="" type="checkbox"/> G-TSDF		<input type="checkbox"/> Groundwater Monitoring
<input type="checkbox"/> T-TSDF		<input type="checkbox"/> Post-Closure
<input type="checkbox"/> G-T-TSDF		

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>—</u>	<u>X</u>	<u>—</u>	<u>—</u>

REMARKS, PART 1. GENERAL INFORMATION
 Include a brief description of site activity and waste handling.

manufacture of incandescent lamps. Primarily generate flammable gasses and solvents. Also generate oils with mercury contamination. Have a PH neutralization unit that discharges into the sanitary sewer.

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ACID NEUTRALIZATION
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>
b) The date that accumulation began is clearly marked on each container.	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention

D: Contingency and Emergency
E: Manifest/Records/Reporting

G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	X			
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	X			
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas , etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	X			
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	X			
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	X			
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17):				
a) Protection from sources of ignition.	X			
b) Physical separation of incompatible waste materials.	X			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	X			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	X			

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	—	<input checked="" type="checkbox"/>	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	<input checked="" type="checkbox"/>	—	—	—
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	—	—	—
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	—	—	—
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<input checked="" type="checkbox"/>	—	—	—
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	<input checked="" type="checkbox"/>	—	—	—
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	<input checked="" type="checkbox"/>	—	—	—
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	<input checked="" type="checkbox"/>	—	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	<input checked="" type="checkbox"/>	—	—	—
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	—	—	<input checked="" type="checkbox"/>	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NEED THE PHYSICAL DESCRIPTION AND CAP OF EMERGENCY EQUIPMENT
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AN EMERGENCY COORDINATOR MUST BE CALLED BY PER. 04
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:

- | | | | | |
|---|-------------|-------------|-------------|-------------|
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)) | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s). | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |
| c) The estimated (or actual) weight, volume or density of the waste material(s). | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980). | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |
| e) The present physical location of each hazardous waste within the facility. | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) | <u> </u> | <u> </u> | <u>X</u> | <u> </u> |
| g) Records of any waste analyses and trial tests required to be performed. | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |
| h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B). | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). | <u> </u> | <u> </u> | <u>X</u> | <u> </u> |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G. | <u>X</u> | <u> </u> | <u> </u> | <u> </u> |

RCRA INTERIM STATUS INSPECTION FORM

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>X</u>			

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)
- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))
- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)
- a) A description of how and when the facility will be closed. (265.112(a)(1)).

<u>X</u>			
<u>X</u>			

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	CLOSURE PLAN MUST AGREE WITH PERMIT
d) A description of steps taken to decontaminate facility equipment,	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
 <u>Subpart H: Financial Requirements</u>				
1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
a) A closure trust fund, or	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
b) A surety bond, or	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
c) A closure letter of credit, or	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
d) A combination of financial mechanisms.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>X</u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers L: Waste Piles O: Incinerators
 J: Management of Tanks M: Land Treatment P: Thermal Treatment
 K: Surface Impoundments N: Landfills Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	X			
b) In good physical condition (265.171)	X			
c) Compatible with the wastes stored in them (265.172)	X			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	X			
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	X			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	X			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).		X		LESS THAN 50 FEET, HOWEVER, WASTE IS IN A BUILDING IN A FLAMMABLE MATERIALS STORAGE ROOM
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	X			

OK per 12/16/81
 Letter by P. Flanagan
 Revised 9/15/82

status 3
Ohio EPA

Re: DHMM
General Electric - Ohio Lamp Plant
Trumbull County
#02-78-0153
G/TSD

OHD 066 052 804

General Electric - Ohio Lamp Plant
1210 North Park Avenue
Warren, Ohio 44483



July 22, 1983

Attn: Mr. Robert Whitmore

Dear Sir:

On June 27, 1983, I conducted a hazardous waste inspection of the General Electric - Ohio Lamp Plant facility located at 1210 North Park Avenue in Warren, Ohio. Mr. John Fedchock, Mr. Howard Russell and you represented this facility during the inspection. The facility was inspected for compliance with both State and Federal regulations for the handling of hazardous wastes.

The following violations and/or concerns were noted during this inspection:

<u>Description of Violation or Concern</u>	<u>Regulation</u>
1. The Contingency Plan must contain a physical description and outline of capabilities of all emergency equipment.	40 CFR Part 265.52 OAC 3745-65-52
2. An emergency coordinator must be on-site or on-call 24 hrs. per day.	40 CFR Part 265.56 OAC 3745-65-56
3. The Closure Plan inventory must agree with the maximum inventory allowed in the Part A permit.	40 CFR Part 265.12 OAC 3745-66-12

Please submit documentation for corrections of these above violations to my attention at the Ohio EPA, Northeast District Office, within 30 days after receipt of this letter.

A copy of the inspection report is enclosed for your information. This inspection will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Mr. James Mayka of U.S. EPA - Region V.

Please advise me or James Mayka at (312) 886-7443 if you have any questions.

Yours truly,

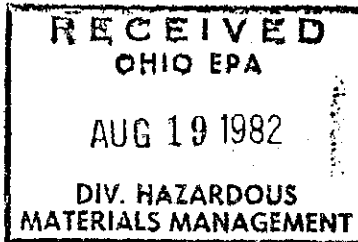
Mark Bergman
Mark Bergman, R.S.
Environmental Scientist
Division of Hazardous Materials Management

cc: Paula Cotter, DHMM, Central
Office
Ken Westlake, U.S. EPA - Region V
Enclosure

MB:km

Re: DHMM
General Electric - Ohio Lamp Plant
Trumbull County
02-78-0153

General Electric Company
Ohio Lamp Plant
1210 North Park Avenue
Warren, Ohio 44483



August 16, 1982

Attn: Robert Whitmore

Dear Mr. Whitmore:

On August 3, 1982, this writer conducted a hazardous waste inspection of the Ohio Lamp Plant located at 1210 North Park Avenue in Warren. The facility was represented by yourself and Mr. Ron Davis. The facility was inspected for compliance with both State and Federal regulations regarding the handling of hazardous wastes.

At the time of the inspection, the facility appeared to be in general compliance with the applicable State and Federal regulations.

A copy of the inspection report is enclosed for your information. This inspection will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Kathy Homer of U.S. EPA - Region V.

Please advise me or Kathy Homer at (312) 886-7435 if you have any questions.

Sincerely,

Helen Takacs
Environmental Scientist
Division of Hazardous Materials Management

HT:km

Enclosure

cc: Paula Cotter, DHMM, C.O.
Kathy Homer, U.S. EPA - Region V

RECEIVED
SEP 1 1982
ENVIRONMENTAL PROTECTION AGENCY
REGIONAL OFFICE
REGION V



Re: Trumbull County
Hazardous Waste
Ohio Lamp, G.E.
81-HW-0153

December 16, 1981

RECEIVED

DEC 18 1981

WASTE MANAGEMENT BRANCH
EPA REGION V

Mr. Robert E. Whitmore
Manager, Manufacturing Engineering
Ohio Lamp - General Electric Co.
1210 North Park Avenue
Warren, Ohio 44483

Dear Mr. Whitmore:

On September 1, 1981, I sent you a letter and a copy of a "Deficiency Notification Table" pertaining to the inspection of your facility conducted by Mr. Jack Burgan of our Northeast District Office on August 25, 1981.

As you know, the deficiency notification table which accompanied my letter was incorrect and did not correspond to the entries on the inspection form.

I am very sorry for the extreme delay in responding to your telephone requests for correction of the errors in my correspondence. It took much more time than anticipated to process the permits for the existing facilities.

The inspection revealed no deficiencies in compliance with interim status standards requirements. There was only one questionable item (Page 9, Section VIII, Item 6) which concerned the distance from the property line of ignitable waste storage. Since the waste is inside a building in a flammable materials storage room, it is my opinion that the intent of the regulation is met.

Again, please accept my apology for the inconvenience caused by my original letter and for the delay in issuing a correction.

I appreciate your patience.

Yours truly,

Paul Flanigan, P.E.
Engineering Section
Division of Hazardous Materials

PF/maf

cc: Peggy Vince, HWFAB
Paula Cotter, DHM
Kathy Homer, USEPA
NEDO
File

GENERAL ELECTRIC

INCANDESCENT LAMP DEPARTMENT

GENERAL ELECTRIC COMPANY, 1210 NORTH PARK AVENUE, WARREN, OHIO 44483
Phone (216) 373-1400

OHIO LAMP PLANT

October 13, 1981

*Inspection
file
K. Homer
10/20/81*

Mr. Paul Flanigan, P.E.
Hazardous Waste Materials Management

RE: YOUR LETTER OF SEPTEMBER 1, 1981 CONCERNING OHIO LAMP PLANT'S
APPLICATION NUMBER 81-HW-0153

Confirming our telephone conversation of 10/9/81, please re-issue the "Deficiency Notification Table, ISS Inspection" showing Ohio in compliance with the State requirements. The present report is in error and shows seven (7) "B" items in violation, when in fact, they meet the State's requirements.

Robert E. Whitmore

Robert E. Whitmore, Manager
Manufacturing Engineering
OHIO LAMP PLANT #3441

REW/bm

cc: Kathleen Homer, U.S. EPA, Region V ←
Art Batey



Re: Application Number 81-HW-0153
Trumbull County

September 1, 1981

Robert Whitmore, Manager
Manufacturing Engineering
General Electric Company, Ohio Lamp Div.
1210 N. Park Avenue
Warren, Ohio 44483

Dear Mr. Whitmore:

On August 25, 1981, Jack Burgan of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by A. L. Kaplan.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script that reads "Paul Flanigan".

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Jack Burgan, NEDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - *81-HW-0153*
 OWNER - *Nela Park-General Electric Co*
 FACILITY NAME - *Ohio Lamp-G.E.*
 FACILITY LOCATION - *1210 North Park Ave., Warren, Ohio 44483*
 FACILITY CONTACT - *A.L. Kaplan*
 ISS INSPECTION DATE - *8/25/81*

PHONE NO. - *(216) 266-8618*

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"	<i>B</i>	<i>✓</i>	
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15	<i>B</i>	<i>✓</i>	
4	2	"	"	<i>B</i>	<i>✓</i>	
	3	"	"	<i>B</i>	<i>✓</i>	
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
5	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
6	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53			
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56	B	✓	
	VI A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"	B	✓	
	g	"	"			
9	VII A 1	3745-56-03	265.112			
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142			
	B 1	3745-56-09	265.118			
	VIII I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176	S	✓	
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265-192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265-193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

P	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
	B	1	3745-57-79	265.309		
			2	"	"	
	C	1	3745-56-03	265.112		
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
	E	1	3745-57-83	265.313		
			3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
			2	"	"	
			3	"	"	
			4	"	"	
16	G	O&P	1	3745-57-85	265.315	
	I	B	1	3745-58-33	265.373	
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	
	II	A	1a	3745-58-35	265.375	
			b	"	"	
			c	"	"	
17			2a	3745-58-35	265.375	
			b	"	"	
	B	1	"	"		
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	3745-52-42	262.42			
	(C)	3745-52-42	262.42			
	2 (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23	X I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

STATE IDENTIFICATION NUMBER

8P-HW- 0153

EPA IDENTIFICATION NUMBER

OH 06652804

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: Ohio Lamp - General Electric Co.
(B) Street: 1210 North Park Avenue
(C) City: Warren (D) State: OH (E) Zip Code: 44483
(F) Phone: 216-373-1400 x-210 (G) County: Trumbull
(H) Operator: Same
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: Nela Park - General Electric Company
(P) Street: Nela Park - Noble Road
(Q) City: East Cleveland (R) State: OH (S) Zip Code: 44112
(T) Phone: 216-266-2111 (U) County: Cuyahoga
(V) Date of Inspection: 25 Aug 81 (W) Time of Inspection (From) 1300 (To) 1515
(X) Weather Conditions: Sunny & Warm

Part A
Sol
Tot

ISS
Containers

(Y)	Person(s) Interviewed	Title	Telephone
	<u>A. L. Kaplan</u>	<u>Mgr. - Env. Control Grp.</u>	<u>216-266-8618</u>
	<u>E. S. Penner</u>	<u>Inc. Dept. Health & Safety Officer</u>	<u>216-266-23</u>
	<u>A. J. Batey</u>	<u>Haz. Waste Coord.</u>	<u>216-373-1400</u>
	<u>E. E. Whitmore</u>	<u>Mgr. Mfg. Eng.</u>	<u>216-373-1400</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
(AA)	Preparer Information		
	Name <u>Jack L. Burgan</u>	Agency/Title <u>OEPA - DSWs</u>	Telephone <u>216-425-9170</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. <u>Storage and/or Treatment</u> | <input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P) |
| 1. <u>Containers (P)</u> | |
| 2. <u>Tanks (J)</u> | |
| 3. Surface Impoundments (K) | <input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q) |
| 4. Waste Piles (L) | |
| <input type="checkbox"/> B. Land Treatment (M) | |
| <input type="checkbox"/> C. Landfills (N) | |

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	<u>X</u>	—	<u>NA</u>
2. Facility expansion?	—	<u>X</u>	—	<u>NA</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	—	—	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	—	—	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	<u>X</u>	—	<u>NA - No such waste</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>X</u>	—	—	
2. Artificial or natural barrier around facility?	<u>X</u>	—	—	
3. Controlled entry?	<u>X</u>	—	—	
4. Danger sign(s) at entrance?	<u>X</u>	—	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	<u>X</u>	—	<u>No occurrence</u>
2. Records of operator error?	—	<u>X</u>	—	<u>No occurrence</u>
3. Records of discharges?	—	<u>X</u>	—	<u>No occurrence</u>

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Will do</i> -----
(F) If required are the following special requirements for <u>ignitable</u> , reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

X — — No occurrence

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?
2. Telephone or 2-way radios at the scene of operations?
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X — — _____
X — — _____
X — — _____

Indicate the volume of water and/or foam available for fire control:

Warren municipal water

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?
2. Is emergency equipment maintained in operable conditions?

X — — _____
X — — _____

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

X — — _____

(E) Is there adequate aisle space
for unobstructed movement?

☒ — — —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the
following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

☒ — — —

☒ — — —

☒ — — —

☒ — — —

☒ — — —

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	—	—	_____
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	—	—	_____
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	—	—	_____
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	—	—	_____
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	<u>X</u>	—	<u>No occurrence</u>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>X</u>	—	—	_____
2. Are records of past shipments retained for 3 years?	<u>X</u>	—	—	<u>Will be</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<u>X</u>	—	—	<u>Will do</u>

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X — —

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X — —

c. The location and quantity of each hazardous waste within the facility?

X — —

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — —

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — —

f. Reports detailing all incidents that required implementation of the Contingency Plan?

— X —

No occurrence

g. All closure and post closure costs as applicable? (Effective 5-19-81)

X — —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>	—	—	_____
2. Has this plan been submitted to the Regional Administrator	—	<u>X</u>	—	<u>Not required</u>
3. Has closure begun?	—	<u>X</u>	—	_____
4. Is closure estimate available by May 19, 1981?	<u>X</u>	—	—	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	—	<u>X</u>	—	<u>Not required</u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: G.E. - Ohio Lamp Date of Inspection: 25 Aug. 81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>	—	—	_____
2. Are containers compatible with waste in them?	<u>X</u>	—	—	_____
3. Are containers stored closed?	<u>X</u>	—	—	_____
4. Are containers managed to prevent leaks?	<u>X</u>	—	—	_____
5. Are containers inspected weekly for leaks and defects?	<u>X</u>	—	—	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	—	<u>X</u>	—	<u>See note #1 on back page</u>

Yes No NI* Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

X _ _

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

X _ _

J
TANKS

W A

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

_ _ _

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

_ _ _

3. Do continuous feed systems have a waste-feed cutoff?

_ _ _

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

_ _ _

5. Are required daily and weekly inspections done?

_ _ _

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

_ _ _

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

_ _ _

*Not Inspected

Yes No NI* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS *NA*

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? _____
2. Do earthen dikes have protective covers? _____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? _____
4. Is the freeboard level inspected at least daily? _____
5. Are the dikes inspected weekly for evidence of leaks or deterioration? _____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) _____
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) _____

L
WASTE PILES *N/A*

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

*Not Inspected

M
LAND TREATMENT

NA

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N
LANDFILLS *NA*

Facility Name: _____ Date of Inspection: _____

Yes No NI* Remarks

(A) General Operating Requirements
Does the facility provide the following:

- | | | | | |
|---|-----|-----|-----|-------|
| **1. Diversion of run-on away from active portions of the fill? | --- | --- | --- | ----- |
| **2. Collection of run-off from active portions of the fill? | --- | --- | --- | ----- |
| **3. Is collected run off treated? | --- | --- | --- | ----- |
| 4. Control of wind dispersal of hazardous waste? | --- | --- | --- | ----- |
- (**Effective 11-19-81)

(B) Surveying and Recordkeeping
Does the Operating Record Include:

- | | | | | |
|---|-----|-----|-----|-------|
| 1. A map showing the exact location and dimensions of each cell? | --- | --- | --- | ----- |
| 2. The contents of each cell and the location of each hazardous waste type withing each cell? | --- | --- | --- | ----- |

(C) Closure and Post-Closure

- | | | | | |
|--|-----|-----|-----|-------|
| 1. Is the Closure Plan available for inspection by 5-19-81? | --- | --- | --- | ----- |
| 2. Has this plan been submitted to the Regional Administrator? | --- | --- | --- | ----- |
| 3. Has closure begun? | --- | --- | --- | ----- |
| 4. Is closure cost estimate available by 5-19-81? | --- | --- | --- | ----- |

(D) Special requirements for ignitable or reactive waste

Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	---	---	---	-----
--	-----	-----	-----	-------

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.				
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?				
If not, the provisions of 40 CFR 265.17(b) apply.				
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?				
2. Does the landfill have a chemically and physically resistant liner system?				
3. Does the landfill have a functional leachate collection system?				
4. Are free liquids stabilized prior to or immediately after placement in the landfill?				
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?				

O and P
INCINERATION and THERMAL TREATMENT

NA

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

I. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

*Not Inspected

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____
B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)				
				Remarks
1. _____				_____
2. _____				_____
3. _____				_____
4. _____				_____
5. _____				_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected

**Specify in Remarks for what period of time this was checked.

IV. Open burning

MA

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

MA

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	_____

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	—	—
4. Are inspection procedures followed according to 265.403?	—	—	—	—
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	—
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	—	—

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	—	—	—
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	—	—	—
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	—	—	—

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	—	—	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	—	—	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	—	—	_____
7. Required certification?	<input checked="" type="checkbox"/>	—	—	_____
8. Required signatures?	<input checked="" type="checkbox"/>	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	<input checked="" type="checkbox"/>	—	—	<i>Will do</i>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	—	—	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	—	—	_____
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	—	—	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<u>X</u>	—	—	<u>Will be</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<u>X</u>	—	—	<u>Will do</u>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	—	<u>X</u>	—	<u>No such waste</u>
--	---	----------	---	----------------------

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	—	—	—	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	
c. Met the Manifest requirements?	—	—	—	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	—	—	—	

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_____	_____	_____	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

#1. Hazardous waste is stored in a flammable materials storage room. This room is acceptable to insurance carrier. The writer feels that this room's storage area meets the requirements of this section.
The adjacent property is railroad tracks.

TSDF TELEPHONE ASSESSMENT SURVEY

west side of port
parking lot

25 Aug 1300
(Robt. Whitmore)
→ Art Baty

FACILITY NAME Ohio Lamp GE EPA I.D. No. 81-HW-0153

CONTACT Robt. Whitmore Art Baty TITLE Mgr. Mfg. Eng. PHONE 373-1406 X-21

1. Does your facility wish to proceed with the Part A application for a Hazardous Waste Treatment/Storage/Disposal permit which was submitted to the Ohio EPA ?

☒ YES, ☐ NO: Please submit a letter of retraction.

2. Does your facility Generate hazardous waste ?

☐ NO, ☒ YES: Section 262 applies (generator standards).

3. Does your facility Transport hazardous waste off-site for itself or other generators ?

☒ NO, ☐ YES: Section 263 applies (transporter standards).

4. Does your facility ☐ Treat, ☒ Store or ☐ Dispose of hazardous wastes ?

If so, Section 265 Subparts B,C,D,E,F,G and H may be applicable.

5. Type(s) of Storage/Treatment:

- ☒ Containers (Subpart I)
☐ Tanks (Subpart J)
☐ Surface Impoundments (Subpart K)
☐ Waste Piles (Subpart L)

6. Type(s) of Treatment/Disposal:

- ☐ Land Treatment (Subpart M)
☐ Landfill (Subpart N)
☐ Incineration (Subpart O)
☐ Thermal Treatment (Subpart P)
☐ Chemical/Physical/Biological (Subpart Q)
☐ Underground Injection (Subpart R)